

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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LEEWARD CONSTRUCTION COMPANY,
LTD.,

Petitioner,

v.

AMERICAN UNIVERSITY OF ANTIGUA –
COLLEGE OF MEDICINE and MANIPAL
EDUCATION AMERICAS, LLC f/k/a GCLR,
LLC,

Respondents.

Case No. 1:12-CV-06280-LAK/GWG
(ECF Case)

Honorable Lewis A. Kaplan
United States District Judge

**DECLARATION OF
KATHERINE M. LIEB**

Katherine M. Lieb, being duly sworn, deposes and says:

1. I am an associate with Sills Cummis & Gross P.C., counsel for respondents American University of Antigua – College of Medicine and Manipal Education Americas, LLC f/k/a GCLR, LLC (collectively, “Respondents”), and am fully familiar with all the facts and circumstances hereinafter set forth herein.

2. I submit the within declaration in support of Respondents’ cross-motion to dismiss this matter on forum non conveniens grounds and, in the alternative, in opposition to petitioner Leeward Construction Company, Ltd.’s motion to confirm an arbitration award and in support of the cross motion to vacate or modify.

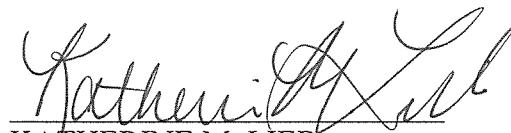
3. Attached hereto as Exhibit A is a copy of the Arbitration Act of Antigua and Barbuda, dated August 15, 1975.

4. Attached hereto as Exhibit B is a copy of a Judgment in *One Call Construction Company Ltd. v. Grenada Solid Waste Management Authority*, decided September 8, 2010, by the Court of Appeal of Grenada.

5. Attached hereto as Exhibit C is a copy of an excerpt from *Redfern & Hunter on International Arbitration*, 5th Edition.

6. Attached hereto as Exhibit D is a copy of the United Nations Convention on the Recognition and Enforcement of Foreign Arbitral Awards, dated June 10, 1958.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



KATHERINE M. LIEB

Dated: September 25, 2012